

## REMARKS

Claims 1-36 are pending in the application. The Office has rejected claims 1, 5-12, 16-23, and 27-36 under 35 USC § 102(e) as being anticipated by Subramanian *et al.* (US Pat. No. 6,718,320). Claims 2-3, 13-14, and 24-25 stand rejected under 35 USC § 103(a) as unpatentable over Subramanian *et al.* (US Pat. No. 6,718,320) in view of Hotti *et al.* (US Pat. Application No. 2002/0169745).

### 102 Rejection (Claims 1, 12, and 23)

Subramanian does not teach "generating a copy of the portion of the multiple database structure using [an] ordered set of object definitions" as required by Applicant. Subramanian shows a query optimization system having a plurality of database tables that are restructuring views of each other. The plurality of database tables each has heterogeneous schemas. Schema maps are created to "translate a received query executable on one of the plurality of heterogeneous database tables to a substantially equivalent query executable on another of the plurality of heterogeneous database tables." (Col. 3, lines 25-28.) Translating a query that is executable on one or more tables to an equivalent query that is executable on a different set of tables is not at all akin to Applicant's technique, in which a copy of a portion of a multiple database structure is generated using an ordered set of object definitions.

The Office has tried to equate this element of Applicant's claims to Subramanian's generation of "the restructuring views ...." Subramanian describes two types of restructuring views. The first type of restructuring view existed at time zero, or prior to any action taught by Subramanian, and no information is given concerning how this restructuring view was created. The second type of restructuring view is the output generated by an SQL query command. This technique and its results are completely different from Applicant's technique. Applicant uses an "ordered set of object definitions" to create database structures whereas Subramanian uses SQL query commands to manipulate data in "restructuring views." Any person of ordinary skill in the art would recognize Subramanian's query commands are entirely different from Applicant's "object definitions" and would see that they are used to perform entirely

different functions. In particular, SQL query commands manipulate data using commands like "select," "insert," "delete," and "update." Object definitions are used to create and modify database structures but do not involve data manipulation.

Subramanian does use object definitions, but he does so only to identify and map data that appears in multiple restructuring views, so that a query using one or more database tables can be translated to a new query that uses one or more different database tables that contain the same data. This is completely different from what is claimed by Applicant.

#### 102 Rejection (Claim 34)

Applicant is at a loss to understand how the reference cited by the Office could possibly show the elements of Applicant's claim 34. There is simply no correlation between the elements of claim 34 and the passages cited by the Office. Subramanian does not show or suggest "inputting definition language specifying a database view identifier" of any sort, let alone one "with at least one directly or indirectly referenced database object unqualified with a containing database identifier." Likewise, Subramanian does not show "inputting a show statement that identifies the database view identifier; and outputting the definition language with each directly or indirectly referenced database object qualified with its containing database identifier." Subramanian simply does not teach a method that has these elements.

#### 103 Rejection

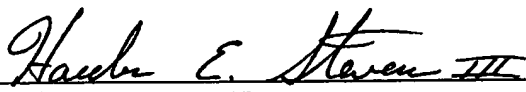
Hotti does not show or suggest "generating a copy of the portion of the multiple database structure using the ordered set of object definitions" as required by Applicant. Hotti teaches a method for managing and coordinating updates to database schemas and related application software in a large distributed multi-database system. The above elements are missing from Hotti. Accordingly, even when combined with Subramanian, Hotti fails to show or suggest the subject of Applicant's claims. All of the claims are therefore allowable over these references.

CONCLUSION

Neither Subramanian nor Hotti, whether taken separately or together, shows or suggests all of the elements of Applicant's claims. Therefore, all claims are allowable over the art of record. Applicant asks the Office to reconsider this application and allow all claims. Please charge any fees that might be due, excluding the issue fee, to deposit account 50-1673.

Respectfully,

Date: 8-20-04

  
Harden E. Stevens, III  
Reg. No. 55,649

NCR Corporation  
1700 South Patterson Blvd.  
Dayton, Ohio 45479

(803) 939-6505  
(803) 939-5099 (fax)